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BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

JUL - 7 1992

Federal Communications Commission  
Office of the Secretary

In the Matter of  
  
Billed Party Preference  
for 0+ InterLATA Calls

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CC Docket No. 92-77

ORIGINAL  
FILE

COMMENTS OF SOUTHWESTERN BELL TELEPHONE COMPANY

SOUTHWESTERN BELL TELEPHONE COMPANY

Durward D. Dupre  
Richard C. Hartgrove  
John Paul Walters, Jr.

Attorneys for  
Southwestern Bell Telephone Company

1010 Pine Street, Room 2114  
St. Louis, Missouri 63101  
(314) 235-2507

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### SUMMARY<sup>\*</sup>

The FCC has previously adopted a non-BPP solution (i.e., access code dialing) to address the problem of the billed-party not being able to use the IXC of choice. BPP achieves network access dialing and card acceptance parity among IXCs in the most convenient manner possible for end-user customers, which is not possible with access code dialing. These service attributes of BPP favor its implementation.

Other factors, however, bear on the decision to implement BPP: 1) costs for service implementation, 2) IXC participation in service offering, 3) vendor production and implementation schedules, and 4) state and federal regulatory cost recovery decisions.

Within the last two weeks, SWBT's BPP vendor price estimates have increased 68 percent. One of SWBT's vendors has recently stated that the prices it has quoted are not yet firm due to lack of knowledge and understanding of the impact of BPP on hardware and software. Therefore, SWBT cannot at this time predict the costs for BPP.

As in the case of BPP implementation costs, SWBT has recently become uncertain about the BPP service participation plans of some of the IXCs that have supported its implementation. Recently in this docket, disagreement has been expressed on the need for IXCs to reissue calling cards. If IXC cards are to be

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<sup>\*</sup> All abbreviations used herein are referenced within the text.

usable on a 0+ basis with BPP, IXCs must reissue proprietary cards not in CIID or 891 formats.

The Commission has indicated that BPP would qualify as a "new" service under LEC price caps. SWBT supports this position. If properly implemented, BPP will provide customers with new service options not previously available. SWBT is concerned, however, that the total cost of implementing BPP may exceed the market willingness to pay.

The majority of BPP implementation costs will be allocated to state jurisdictions. The Commission and market participants need to better understand the view of State regulatory commissions on BPP cost recovery before a prudent business decision can be made on the implementation of BPP.

Various questions posed by the Commission about BPP are answered herein.

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Southwestern Bell Telephone Company (SWBT) submits these Comments in the above-referenced proceeding. By and through this proceeding, the Commission seeks further comment on the costs, benefits and implementation of Billed Party Preference (BPP).

I. INTRODUCTION

BPP is a service concept which would allow the billed party, on alternately billed interLATA calls, to determine the Interexchange Carrier (IXC) for call transport. Most alternately billed calls are placed by simply dialing either 0+ or 0- and are billed collect, to a third number or to a Local Exchange Carrier (LEC) or Interexchange Carrier (IXC) calling card. BPP is also known as Exchange Access Operator Services-Carrier Identification (EAOS-CID).

Today a 0+ call is routed based on presubscription or premise agent decisions. The customer originating the call determines the IXC for call transport, utilizing either the carrier presubscribed to the telephone in question or one of the following dial codes: 0+, 0-, 10XXX+0, 800 number, 950-1XXX or 00-. On many calls, the IXC chosen for call transport by the originating customer is not the service provider that the billed (i.e., paying) party would prefer. This situation has led to customer complaints

and confusion, as well as inequities in the marketplace among carriers and card issuers.

BPP would replace presubscription as the means of providing equal access on 0+ and 0- interLATA calls. In a Billed Party Preference environment, the billed party, instead of the customer originating the call, would determine the IXC for call transport. The following describes how calls subject to BPP treatment would be processed:

1. InterLATA 0+ calls would no longer directly route to an IXC. Instead, all 0+ and 0- calls would route to a LEC Operator Services System (OSS) for call jurisdiction determination and/or BPP treatment. Calls placed with access codes would still route to the chosen IXC.
2. Billing information (i.e., collect, third number, or calling card) would be obtained from the customer placing the call at the OSS by either machine or operator assistance.
3. This information would be used to query a data base or OSS table logic to determine the carrier choice of the billed party. As described below, depending on whether LEC or IXC information is being used to bill the call, either a data base query or table look-up would be used to route BPP calls to the various IXCs:

A. LEC billing information (calling card, collect and third number).

A data base query from the LEC OSS handling the call would be launched to the Line Information Data Base (LIDB) containing the billing information. A response from the LIDB would be provided to the LEC OSS, indicating the carrier choices of the billed party.

B. IXC calling cards.

IXC card issuers could have the option of choosing either card issuer routing or data base query routing carrier determination. These options could also possibly be made available to commercial credit card issuers in future upgrades to BPP functionality.

1. Card Issuer Routing.

With this option, calls would be routed by specific 6-digit code sets to the IXC which issued the card. Card issuer information stored in OSS table logic would be used to route calls with this option.

2. Data Base Query Routing.

This option is similar to 3.A. above. A query from the LEC OSS handling the call would be launched to the IXC calling card data base containing the billing information. A response from the IXC data base would provide the LEC OSS the carrier choices of the billed party.



4. Following carrier determination, the call would be released to the billed party's preferred IXC for completion.

BPP has had many definitions within the industry. By SWBT's count, as many as 144 different methods have been suggested, on the public record alone, for defining and implementing BPP. The Commission's NPRM has provided much of the required framework of a common definition of BPP. However, industry agreement on a common definition and answers to many BPP implementation questions remain elusive. Answers to these outstanding issues will directly impact the decisions which the Commission makes in this docket.

As will be explained, SWBT continues to support the BPP service concept, provided that it is implemented with the following scope, definition and service applications, and provided that other significant concerns of SWBT (detailed further herein) are satisfactorily addressed:

As defined by SWBT, Billed Party Preference should apply on interLATA calls in the following manner:

- All station providers (i.e., BOCs, ITCs, IXCs, COCOTs, etc.).
- All originating station types (i.e., business, residence, coin, hotel/motel, etc.).
- All 0+ and 0- interLATA calls. Calls placed with access codes would still route to the chosen IXC.
- All end office types (i.e., equal access and non-equal access).

- All alternate billing types. The initial phase of BPP should include functionality required for collect, third number, and LEC/IXC calling cards. Later phases of BPP functionality could include requirements for processing commercial credit card calls and calls billed to foreign billing information (i.e., calls billed to telephone accounts assigned outside the North American Numbering Plan).

## II. DECISIONS REQUIRED.

The FCC has previously adopted a non-BPP solution to address the problem of the billed-party not being able to use the IXC of choice. This solution requires access code dialing (i.e., 10XXX+0, 800 numbers, and 950-1XXX+0), which is more inconvenient for end-user customers than the dialing required with BPP. Perhaps more importantly, access code dialing does not achieve the same result as BPP (i.e., billed-party choice of IXC). BPP achieves network access dialing and card acceptance parity among IXCs in the most convenient manner possible for end-user customers, which is not possible with access code dialing. These service attributes of BPP favor its implementation, as the Commission has noted.<sup>1</sup>

Other factors, however, bear on the decision to implement BPP: 1) costs for service implementation, 2) IXC participation in service offering, 3) vendor production and implementation schedules, and 4) State and Federal Commission decisions concerning

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<sup>1</sup>Notice of Proposed Rulemaking, CC Docket No. 92-77, (released May 8, 1992), p. 2.

cost recovery. Answers to these issues, combined with the possible benefits of BPP, must be compared to the status quo (i.e., access code dialing) to arrive at a prudent decision regarding implementation of BPP.

SWBT continues to believe that implementation of the BPP service concept would provide the most effective solutions for the issues raised in this docket. Within the last ten days, however, SWBT has been provided significantly revised and apparently conflicting information by its vendors and other parties potentially impacted by BPP implementation. SWBT has been unable to reconcile major differences in information previously provided and that most recently received. SWBT has also been unable to obtain planning price quotes from its vendors for all of the significant cost elements required for BPP implementation.

SWBT will present herein its conclusions, thus far, in response to the comments solicited by the Commission. SWBT will analyze the information it continues to be provided on BPP implementation costs. Availability of reliable vendor information is a requirement for development of all information requested by the Commission.

### III. POTENTIAL BENEFITS OF BPP.

SWBT has previously expressed its views on the potential benefits of BPP. Briefly restated, the potential benefits of BPP implementation include the following:

A. BPP will address end-user customer service issues.

There has been a great deal of controversy during the past three years concerning abuses to end-user customers by operator services providers (OSPs). These abuses are a result of (1) rates charged by certain OSPs, and (2) OSP practices which prevent customers' using the OSP of choice. Consumer groups, National Association of Regulatory Utility Commissioners (NARUC), and Congress have all requested the Commission to correct these abuses, and the Commission has adopted rules to provide consumer protection.

The rules were intended to allow consumers to reach the OSP of choice. For these rules to be effective, however, consumers must analyze and understand the available operator service information, then calculate the per call rate of each OSP. Customers must also know the preferred carrier of the party who will pay for the call. Customer confusion concerning operator service providers is pervasive, and consumers often opt for the easy way out--in this case, simply using the OSP to which the phone is presubscribed. Thus, despite the intent of the Commission's rules, customer rate shock will persist, as will customer complaints and competitive inequities.

With BPP, the consumer who will pay for 0+ and 0-interLATA calls could study the rate and service plans of various OSPs and predetermine a provider that best meets the consumer's needs. As a consumer travels, rather than being forced to scrutinize material at each hotel or pay phone, the consumer can be assured that, in the most convenient manner possible, the preferred

carrier will provide the requested service on 0+ and 0- interLATA calls.

B. BPP will accomplish the objectives of the Commission in the most convenient manner possible.

In Docket 90-313,<sup>2</sup> the Commission listed three goals in adopting rules for the OSP industry:

- free customers from charges they did not agree to;
- free customers from practices that prevent them from using the OSP they prefer;
- foster a marketplace environment in which OSPs compete based on the merits of their services, rather than on the commission payments which OSPs provide to traffic aggregators who deliver a captive clientele.

While BPP was not proposed by the Commission to achieve these objectives, BPP could provide a more convenient and equitable means for addressing end-user abuses and competitive inequities than the solutions adopted by the Commission (i.e., status quo).

C. BPP is pro-competitive.

BPP provides an effective means for IXC's to compete in the calling card market. BPP would extend to all IXC's the benefits of 0+ dialing and mutual card acceptance that are today enjoyed solely by AT&T. All IXC's would be at parity on 0+ dialing and card acceptance capabilities. BPP is the only service concept known to SWBT capable of providing these results.

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<sup>2</sup>Notice of Proposed Rulemaking, CC Docket No. 90-313 (released July 17, 1990), p. 7.

BPP also provides a more effective means for IXC's to receive interLATA traffic on a 0+ basis from any location regardless of the billing information being used. In a presubscription environment, end-users must dial access codes in order to a) use a carrier that is different from the one to which the line is presubscribed or b) use billing mechanisms (i.e., proprietary IXC calling cards or commercial credit cards) that the presubscribed carrier does not or cannot accept. BPP, therefore, should allow IXC's to promote their billing mechanisms from any phone and without the use of access code dialing.

In addition, BPP provides the mechanism required for SWBT to seek mutual card honoring agreements (MCHAs) with all IXC's. It is not possible today for non-AT&T carriers to advertise their proprietary card products on a 0+ basis, since AT&T enjoys a significant majority of the market. To overcome this disadvantage, IXC's other than AT&T promote their calling cards on an access code basis. Since all calls dialed with access codes are routed directly to the IXC, SWBT's network is bypassed. SWBT is, therefore, precluded from entering into a mutual card honoring agreement with IXC's other than AT&T. BPP will eliminate the need for access code promotion, which will facilitate MCHAs between SWBT and all IXC's. MCHAs will permit customers to use cards issued by carriers other than AT&T in the most convenient manner possible (i.e., 0+) for placement of local and intraLATA calls. BPP will, therefore, extend network access and card acceptance parity to all IXC's.

IV. UNKNOWNNS TO SWBT.

Before the benefits of BPP can be realized, answers must be developed to certain key issues. These issues are as follows:

A. Vendor And Other Implementation Costs.

SWBT has attempted to keep current its estimates for implementation of BPP. These estimates have certainly not remained static over the several years that BPP has been a service consideration. SWBT's requests for updated vendor costs, following release of the Commission's NPRM, have produced several iterations of responses. Within the last two weeks, SWBT's BPP vendor price estimates have increased from approximately \$75 million to \$127 million. This represents an increase of 68 percent within the last weeks before comments were due in this proceeding. The recent change in prices, which are now characterized as "soft" planning prices, along with contradictions to previously provided information, cause SWBT to have serious concerns about the final projected level and availability of vendor prices and total implementation requirements.

SWBT's vendors have stated they are continuing to assess BPP requirements and plan to provide more complete and accurate price information "as it becomes available." One of SWBT's vendors has recently stated that the prices it has quoted are not yet firm due to lack of knowledge and understanding of the impacts from requisite BPP functionality on vendor hardware and software. Therefore, SWBT cannot at this time predict the costs for BPP.

B. IXC Demand.

The success of BPP will be determined, in part, by the willingness of IXCs to participate in the service. SWBT has assumed that the majority of IXCs will recognize the benefits and will participate in BPP. These assumptions have been based on IXC input to SWBT and analyses of market positions and forces in a BPP environment--if at least two of the three major IXCs are service participants. In an least one case however, SWBT's analyses produced different results than the stated positions of some IXCs.

As in the case of BPP implementation costs, SWBT has recently become uncertain about the BPP service participation plans of some of the IXCs that have supported its implementation. Recently in this docket, disagreement has been expressed on the need for IXCs to reissue calling cards. If IXC cards are to be usable on a 0+ basis with BPP, IXCs must reissue proprietary cards not in CIID or 891 formats.

IXC participation in BPP is critical. SWBT believes that IXCs which support BPP should be willing to reissue cards and promote customer dialing instructions, which will produce the benefits of BPP. Otherwise, the convenience and other benefits of BPP will not be fully realized.

C. Cost Recovery.

The ability of LECs to recover BPP implementation costs is also a key concern. Implementation of BPP may require significant enabling upgrades to network infrastructure which may eventually support services other than BPP. While SWBT supports



the introduction of BPP and the new customer benefits it will provide, it is concerned that the total cost of implementing BPP may exceed the market willingness to pay.

The Commission has indicated that "billed party preference would qualify as a 'new' service under LEC price caps."<sup>3</sup>. SWBT supports this tentative conclusion. If properly implemented, BPP will provide customers with new service options not previously available.

The views of State regulatory commissions concerning BPP cost recovery are also not yet known. The majority of BPP implementation costs will be allocated to state jurisdictions. The Commission and market participants need to better understand the views of State regulatory commissions on BPP cost recovery before prudent business decisions can be made on the implementation of BPP.

V. SWBT'S RESPONSE TO QUESTIONS CONTAINED IN NPRM.

SWBT provides the following information to questions posed by the Commission.<sup>4</sup>

A. "Estimated Total Costs For Implementing And Operating A Billed Party Preference System."

SWBT has previously estimated that BPP could be implemented for approximately \$50 million. SWBT's estimation was based on the most current information available and included certain assumptions which may no longer be valid. It now appears

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<sup>3</sup>NPRM, p. 11.

<sup>4</sup>NPRM, pp. 11-14.

SWBT's previous estimate is the "floor" for recently projected costs for just BPP signaling requirements.

As explained above, SWBT's confidence level in the vendor costs projected for BPP has declined due to significantly revised and apparently conflicting information from its vendors and other parties potentially impacted by BPP implementation. There is simply too much information not yet provided to SWBT to permit total costs and resulting analyses to be provided with reasonable confidence.

B. "Whether BPP Would Require Callers To Provide Certain Information About Their Call (Such As Calling Card Number) Twice."

This issue appears to be moot. When BPP was first introduced as a service concept, there were concerns about the need for "two operators" to be involved on a large portion of BPP calls.

Implementation in LEC and IXC OSS networks of Automated Alternate Billing Services (AABS) and either Equal Access Operator Services Signaling (EAOSS), Operator Services System/Signaling System 7 (OSS7), or other functionally equivalent signaling protocol will virtually eliminate the need for two operators to be involved on a BPP call. Most of the industry has announced plans to implement these technologies prior to or coincident with the implementation of BPP.

The combination of these two technologies reduces the need for two operators to be involved on the majority of calls in the following fashion:

- Customer acceptance of expansion of automated billing input from just calling card calls to bill-to-third and collect calls (i.e., AABS) eliminates the need for human assistance on these types of calls. SWBT's experience with AABS acceptance indicates that approximately 70 percent of calls will be placed fully utilizing AABS. An additional 20 percent will partially utilize AABS and only require assistance (i.e., receipt of billing information) from a LEC operator unless name information is required for call processing. The remaining 10 percent may not utilize AABS, but will only require assistance from a LEC operator unless name information is required for call processing.
  
- EAOSS or OSS7 will permit all of the number information obtained at LEC OSSs by either machine or operator assistance to be passed mechanically to the billed party's IXC. The need for "two operators" will, thus, only exist when the customer does not utilize AABS and there is a need to include name information in call processing (i.e., person-to-person calls). The percentage of such calls to total BPP calls will be minimal.

C. "The Impact BPP Would Have On Access Times For Operator Service Calls."

As with concerns about "two operators," concerns were initially expressed about possible increases in access times for calls processed under BPP. Advances have been made in implementation of signaling and call processing technologies since these concerns originally arose. Further, BPP should be deployed with the technology (1) to process the majority of calls without the need for human assistance, and (2) to pass on all number information collected by a LEC OSS to the various IXC POPs. Additionally, one of the benefits of BPP, 0+ dialing, will reduce the number of digits that customers must dial. For these reasons, access times should not increase with BPP.

D. "The Impact BPP Might Have On Competition In The Provision Of Payphones."

Competitive payphone providers presently receive and pay commissions based on the amount of traffic processed by the presubscribed OSP. Since BPP would replace presubscription as the means of call routing, the existing arrangements of competitive payphone providers would probably no longer exist. However, the mechanism the Commission has recently ordered and is further considering for compensating competitive payphone providers could also be applied in a BPP environment. This would appear to obviate previous concerns.

E. "Whether Some Or All Of The Benefits Of BPP Might Be Obtainable Through Alternative, Less Costly Technologies."

SWBT is not aware of any alternative technologies which would provide the benefits of BPP. Alternative suggestions, with different technical requirements than BPP, have been proposed. However, none of these suggestions provide the consumer conveniences and assurances and pro-competitive benefits of BPP.

F. "Whether The Commission Should: a) Require All LECs To Implement BPP, and b) Amend Part 68 Of Our Rules To Preclude Traffic Aggregators And Payphone Providers From Using Automatic Dialing Mechanisms To Program Their Phones To Dial Around BPP."

Unless the Commission took these actions, the viability of BPP would be problematic. Service providers would most likely by-pass BPP requirements through re-dialers or other means, just as they have with today's process of presubscription routing.

G. "When BPP Could Be Implemented By All LECs."

SWBT's best estimate of BPP implementation is:

<u>ACTIVITY</u>	<u>ESTIMATED DATE</u>
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FCC Order Mandating BPP Implementation	3Q93
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First Office Application (FOA)/ Verification Office (VO) of vendor development	1Q95
--	------

General Availability of vendor products	3Q95
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Implementation Complete (all LECs, IXCs, OSPs, competitive payphone providers, etc.)	2Q96
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<u>TOTAL</u>	<u>33 Months</u>
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(MONTHS REQUIRED FROM FCC ORDER FOR COMPLETE  
IMPLEMENTATION)

H. "The Types Of Calls For Which BPP Should Be Implemented."

If implemented, Billed Party Preference should apply as follows:

- All station providers (i.e., BOCs, ITCs, IXCs, COCOTs, etc.);
- All originating station types (i.e., business, residence, coin, hotel/motel, etc.);
- All 0+ and 0- interLATA calls. SWBT assumes that calls placed with access codes (10XXX+0, 800 Number,

etc.) would still route to the IXC associated with the specific code used, even though this might prove detrimental to BPP;

- All end office types (i.e., equal access and non-equal access);
- All alternate billing types. The initial phase of BPP should include functionality required to apply BPP treatment to collect, third number, and LEC/IXC calling card calls. Later phases of BPP functionality could include requirements for processing commercial credit card calls and calls billed to information assigned by telephone companies outside of the North American Numbering Plan. The development time required for this latter functionality would delay the initial implementation of BPP.

I. "Whether BPP Could Be Applied To Calls Originating From Non-Equal Access Areas."

SWBT is not aware of any technical reason why BPP should not apply to all end office types. BPP should, therefore, apply to all 0+ and 0- interLATA calls, whether calls originate from equal or non-equal access end offices. This application would be essential to ensure an easy to understand and consistent marketing message to customers on the universality of BPP benefits. If BPP did not apply to calls originating from non-equal access end offices, customers who placed calls from those locations would be

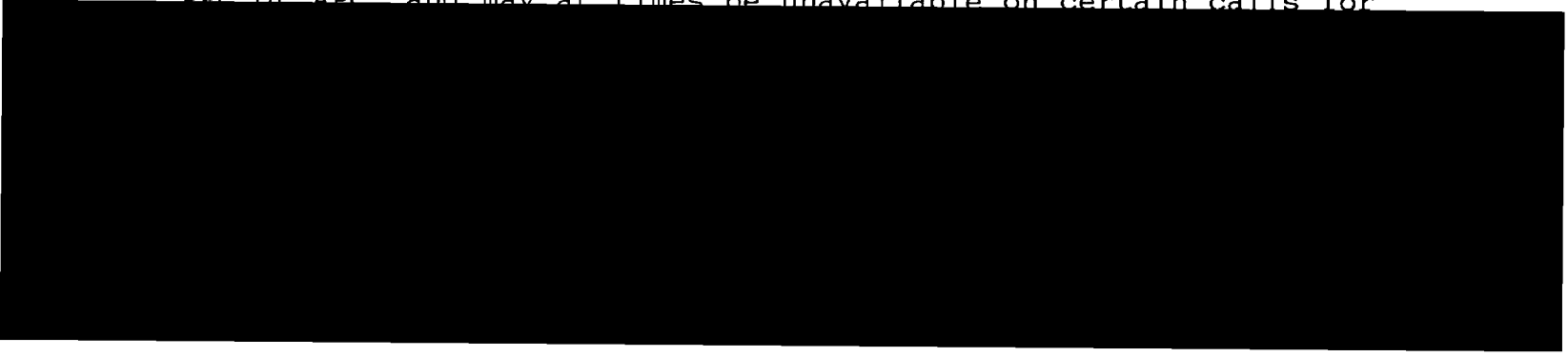
disappointed and become disillusioned with the claims of BPP benefits. This could lead ultimately to by-pass of BPP.

Additionally, the conveniences and consumer assurances possible with BPP should apply to non-equal access customer billing information, whether such information is being used to place calls from equal access or non-equal access end offices.

J. "The Process By Which A 0+ Carrier Should Be Assigned To Each Telephone Line."

LIDB has the capability of storing three carrier choices: 1) Primary Preferred Carrier (PPC), 2) Alternate Preferred Carrier (APC), and 3) International Preferred Carrier (IPC). The billed party's PPC would be the IXC the LEC OSS would first attempt to honor on calls subject to BPP.

When the billed party's PPC is unavailable to handle the call (i.e., the PPC does not serve the type traffic associated with the given call, or does not have a POP in the originating and/or terminating LATA in order to serve the call), the LEC OSS would then consider the billed party's APC. However, if the APC is not a nationwide service provider, the APC may be unavailable at times for the same reasons that a PPC might be unavailable. In this case, the caller (i.e., originating customer) could be asked for an IXC preference. The billed party's IPC would be honored on all international calls subject to BPP. The IPC may be the same as the PPC or APC and may at times be unavailable on certain calls for





There appear to be three options for populating LIDBs with carrier choice decisions which route calls to the billed party's preferred IXC.

1. A requirement that the "0+" carrier be the same as the billed party's "1+" carrier;
2. "Soft" or passive solicitation of customers, advising them of options and processes to be used if changes/decisions are desired;
3. A simple query of customers for decisions required.

It is in the public's best interest for the PPC of customers served by equal access end offices to be based initially on each customer's Feature Group D (1+) carrier choice. Likewise, the PPC initially loaded for customers served by non-equal access end offices should be based on each customer's "default" carrier. Procedures should be in place to permit a customer to change its carrier choice for "Dial 0" interLATA calls to a carrier different than the customer's 1+ carrier, or to change both to a different carrier.

These arrangements would provide all competitors equal opportunity to solicit customers for service. As in the existing process for "1+" carrier choices, procedures should be in place to also allow IXCs the option of ordering on their customers' behalf.

"Teaming" between regional and other regional or national interexchange carriers should be the means of populating the APC and IPC, with procedures for allowing customers to change.